

# NEVADA UIC GRANT

## End of Year Evaluation

### SFY 2015

#### Introduction:

The Safe Drinking Water Act, Section 1443(b) and 40 CFR Parts 31 & 35 Subpart A, Underground Injection Control (UIC) provides for a federal grant award made annually to the Nevada Division of Environmental Protection (NDEP), Bureau of Water Pollution Control. NDEP made commitments for the UIC work to be performed with EPA grant funds in a four-year workplan covering Fiscal Years 2015 through 2018. The four-year workplan covers administration and coordination, permitting UIC wells, performing facility inspections, completing compliance evaluations, witnessing mechanical integrity tests, and taking appropriate enforcement actions.

This end-of-year evaluation covers UIC activities performed by NDEP during SFY15 (July 1, 2014-June 30, 2015) and funded with Federal FY15 funds and state matching funds. The evaluation is based on information provided by NDEP to U.S. EPA, Region 9 (Region 9) through quarterly reports reviewed in relation to NDEP's four-year UIC grant workplan.

The total SFY 2015 grant funds and manyears covered under this grant review period are:

**Manyears: 2.5**

**FY 2015 Federal Funds: \$80,000**

**FY 2015 State Matching Funds: \$22,467.75**

**Four Year Cycle Total: \$420,000**

#### **1. Administration and Coordination of Program**

NDEP's work this year focused on permitting, inspections, compliance evaluations, reviewing and witnessing mechanical integrity tests (MIT) and enforcement actions. NDEP gave priority to Class II and Class V wells having the highest potential to degrade ground water or most significantly impact drinking water sources.

NDEP met all commitments in Tasks 1.a to 1.c of the workplan. Under Task 1.c, collaboration efforts and data sharing by NDEP with the source water protection program are reported under the Nevada SRF 15% set-aside grant.

NDEP and Region 9 signed the Trading Partner Agreement and associate data matrix. This agreement establishes the terms and conditions under which both parties agree to exchange UIC program data through the National Exchange Network.

Workplan Commitments		
Task	Output	Due Date
1.a	Administer Program	On-going
1.b	State and EPA will exchange information continuously, and report activities quarterly	As needed
1.c	Report on efforts to coordinate with protection program	Quarterly reports

## **2. Permitting**

NDEP continues to process permit applications in a timely manner, including individual, area, general, and those individual permits needing to be modified and/or renewed. A total of 20 permit applications were received and 29 issued/modified/renewed during SFY 2015.

NDEP met the reporting obligations for Tasks 2.a-d.

<b>Permitting Data for SFY 2015 reported to EPA, Region 9</b>					
<b>UIC Permits</b>	<b>1<sup>st</sup> Qtr.</b>	<b>2<sup>nd</sup> Qtr.</b>	<b>3<sup>rd</sup> Qtr.</b>	<b>4<sup>th</sup> Qtr.</b>	<b>Year Totals</b>
<b>Task 2.a-d Received</b>	<b>2</b>	<b>4</b>	<b>4</b>	<b>10</b>	<b>20</b>
<b>Task 2.a-d Issued/Modified/Renewed</b>	<b>6</b>	<b>9</b>	<b>9</b>	<b>5</b>	<b>29</b>

<b>Workplan Reporting Commitments</b>		
<b>Task</b>	<b>Output</b>	<b>Due Date</b>
2.a	Number of applications received; Number of permits issued by well class	Quarterly
2.b	Number of general permit applications received; Number of general permits issued	Quarterly
2.c	Number of minor, major, and renewal applications received; Number of minor and major permit modifications; Number of renewed permits.	Quarterly
2.d	Number and well type of any new general permits under development	Quarterly

## **3. Inspections/Mechanical Integrity Tests**

NDEP continues to conduct inspections of the Class II, III and V permitted facilities, including routine, application/new construction, witnessing cementing during construction, and plugging & abandonment activities. A total of 30 inspections were conducted during SFY 2015. NDEP continues to witness and/or review results for all MIT tests, internal and external. MITs are required for Class II wells every 2.5 years. A total of 9 MITs were witnessed or reviewed during SFY 2015. 0 MIT failures were reported for SFY2015.

NDEP met the reporting obligations for Tasks 3.a-c.

NDEP committed to close three endangering wells (target 3 per year) and to close any cesspools discovered. No well or cesspool closures were reported for SFY 2015.

<b>Inspections/Mechanical Integrity Tests Data for SFY 2015 reported to EPA, Region 9</b>					
<b>Quarter</b>	<b>1<sup>st</sup> Qtr. SFY 2015</b>	<b>2<sup>nd</sup> Qtr. SFY 2015</b>	<b>3<sup>rd</sup> Qtr. SFY 2015</b>	<b>4<sup>th</sup> Qtr. SFY 2015</b>	<b>Total</b>
<b>Task 3.a.-b. Inspections Class II &amp; V</b>	<b>1</b>	<b>5</b>	<b>6</b>	<b>18</b>	<b>30</b>
<b>Task 3.c MITs Class II &amp; V</b>	<b>0</b>	<b>4</b>	<b>4</b>	<b>1</b>	<b>9</b>

<b>Workplan Reporting Commitments</b>		
<b>Task</b>	<b>Output</b>	<b>Due Date</b>
3.a	Number of Class II wells inspected; Number of permitted Class V well facilities inspected	Quarterly
3.b	Number of non-permitted facilities inspected; Number of wells identified Number of wells closed or permit (Measure SDW-06)	Quarterly
3.c	Number of MITs conducted: Class II Class V Number of MIT failures: Class II Class V Percentage of Class II wells in compliance with MITs (SDW-07b)	Quarterly

#### **4. Enforcement/Compliance**

NDEP continues to identify all injection wells in non-compliance. A total of 9 enforcement actions were taken during SFY 2015.

NDEP met its commitments under Tasks 4.a-c.

<b>Enforcement/Compliance Data for SFY 2015 reported to EPA, Region 9</b>					
<b>Quarter</b>	<b>1<sup>st</sup> Qtr. SFY 2015</b>	<b>2<sup>nd</sup> Qtr. SFY 2015</b>	<b>3<sup>rd</sup> Qtr. SFY 2015</b>	<b>4<sup>th</sup> Qtr. SFY 2015</b>	<b>Total</b>
<b>Task 4.a. Enforcement Actions</b>	<b>3</b>	<b>4</b>	<b>1</b>	<b>1</b>	<b>9</b>

<b>Workplan Commitments</b>		
<b>Task</b>	<b>Output</b>	<b>Due Date</b>
4.a	Report enforcement activities and cases of significant and non-significant non-compliance using information gathered by inspections and monitoring report review.	Quarterly
4.b	Take enforcement action against operators identified by EPA for national enforcement action.	As needed
4.c	Investigate reports of unauthorized injection and take appropriate action.	As needed

## **5. Public Information and Education / Technical Assistance**

NDEP provided public notice on all pending draft permits as required by Task 5.a.

<b>Task</b>	<b>Output</b>	<b>Due Date</b>
5.a	Actions are public noticed	Continuous with Task 3.a and 3.b
5.b	Public hearings held and appeal hearings attended	As needed
5.c	Provide technical assistance, conduct workshops, give presentations, and develop fact sheets and other educational materials. Update UIC web pages	As needed and as time allows

## **6. Reporting to EPA**

NDEP's submitted its quarterly reports for Task 6.a.

NDEP submitted the Final Budget Status Report on September 19, 2015. NDEP submitted the Final Federal Financial Report, which was processed by EPA Region 9 on 10/6/15, as required by Task 6.b.

NDEP submitted an Annual Well Inventory Spreadsheet for SFY 2015 as required by Task 6.c.

Under Task 6.d, NDEP successfully transmitted data electronically to EPA's national database, therefore NDEP no longer needs to submit paper 7520s. All future 7520 submittals will be done electronically.

NDEP met with EPA Region 9 in November 2015 and presented its summary program update as required by Task 6.e.

NDEP conveyed WBE/WBE reports for 2015 as required by Task 6.f.

Under Task 6.g, NDEP reported that they had no new activity during SFY 2015 for measure SDW-8. No MITs were witnessed or reviewed during SFY 2015, a SDW-7 measure. Please note: EPA combined the 3 classes of Activity Measure (PAM) data on SDW-7 and 8 annually. NDEP will continue to provide summary data through IMRS and preliminary well specific data through the UIC Database no later than November 15. Since there is no transfer mechanism between the UIC Database, Inventory Measures and Reporting System (IMRS) and Agency Commitment System (ACS) this data must be sent directly to EPA Region 9 to enter manually into the ACS.

<b>Task</b>	<b>Output</b>	<b>Due Date</b>
6.a	Quarterly Reports	Due by 30th day following end of quarter
6.b	Final Budget Status Report	9/30/15
6.c	Annual Well Inventory Spreadsheet	January 15 <sup>th</sup> of each grant year
6.d	Biannual 7520 reports	Based on Federal FY, due by 30th day following end of reporting period
6.e	Summary Program Updates	By Water Program meetings date
6.f	MBE/WBE report	2015 as required
6.g	Measures Reporting (PAM) SDW-7 and 8	Annually